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1	FILED	LODGED
2	RECEIVED	
3	OCT -8 2024	
4	CLERK U.S. DISTRICT COURT	
5	WESTERN DISTRICT OF WASHINGTON AT TACOMA	
6	BY	DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

The Mahto Trust for
the Marcus Tracy Mahto
Estate

CASE NO. 3:24-cv-5859-MJP
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: Yes No

Plaintiff(s),

v.

Progallup Brick/KMC
Hawks of FG

Defendant(s).

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

The Mahto Trust, Chief Mahto, Attorney
3118 Jackson St, Seattle, WA 98101

Street Address

City and County

(Gig Harbor, Washington) 233-35-9718

State and Zip Code

(Washington) 98335-9718

Telephone Number

(253) 541-9019

Pro Se I 2022

1 B. Defendant(s)

2 Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

4 Defendant No. 1

5 Name

6 Job or Title (if known)

7 Street Address

8 City and County

9 State and Zip Code

Telephone Number

Puyallup Buick / GMC
Governor Harnish
2000 River Road
Puyallup
Washington)

10 Defendant No. 2

11 Name

12 Job or Title (if known)

13 Street Address

14 City and County

15 State and Zip Code

16 Telephone Number

Honda of Fife
General Manager
4301 20th St. E
Fife, WA 98424

17 Defendant No. 3

18 Name

19 Job or Title (if known)

20 Street Address

21 City and County

22 State and Zip Code

23 Telephone Number

24

Pro Se 1 2022

1 Defendant No. 4

2 Name _____

3 Job or Title (*if known*) _____

4 Street Address _____

5 City and County _____

6 State and Zip Code _____

7 Telephone Number _____

8 **II. BASIS FOR JURISDICTION**

9 Federal courts are courts of limited jurisdiction (limited power). Generally, only two
 10 types of cases can be heard in federal court: cases involving a federal question and cases
 11 involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under
 12 the United States Constitution or federal laws or treaties is a federal question case. Under 28
 13 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and
 14 the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of
 15 citizenship case, no defendant may be a citizen of the same State as any plaintiff.

16 What is the basis for federal court jurisdiction? (*select all that apply*)17 Federal question:

If checked complete section A.



Diversity of citizenship:

If checked complete section B.

18 Fill out the paragraphs in this section that apply to this case.

19 A. If the Basis for Jurisdiction Is a Federal Question

20 List the specific federal statutes, federal treaties, and/or provisions of the United States
 21 Constitution that are at issue in this case. *Attach additional pages if needed.*

22 *Constitution for 1789, Exclusive Equity (Newby
 23 v. Enron)*

Pro Se 1 2022

1 B. If the Basis for Jurisdiction Is Diversity of Citizenship

2 1. The Plaintiff(s)

3 a. If the plaintiff is an individual.

4 The plaintiff (name) Chief Mahto, Agent in Commerce is a citizen of the
5 State of (name) Idaho.

6 b. If the plaintiff is a corporation.

7 The plaintiff, (name) MARCUS TROY REHM, is incorporated under
8 the laws of the State of (name) Idaho, and has its principal
9 place of business in the State of (name) Kenya.

10 *(If more than one plaintiff is named in the complaint, attach an additional page providing
the same information for each additional plaintiff.)*

12 2. The Defendant(s)

13 a. If the defendant is an individual.

14 The defendant, (name) _____, is a citizen of the
15 State of (name) _____. Or is a citizen of
16 (foreign nation) _____.

17 b. If the defendant is a corporation.

18 The defendant, (name) Honda of Fife, is incorporated under
19 the laws of the State of (name) WASHINGTON, and has its principal
20 place of business in the State of (name) WASHINGTON.

21 Or is incorporated under the laws of (foreign nation) _____,
22 and has its principal place of business in (name) Fife, WA.

23 *(If more than one defendant is named in the complaint, attach an additional page
providing the same information for each additional defendant.)*

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1 3. The Amount in Controversy.

2 The amount in controversy-the amount the plaintiff claims the defendant owes or the
 3 amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain)
 3 Attach additional pages if needed:

4 Cost of vehicles plus attorney/legal fees
 5 at the published rate of \$100,000, per
 6 minute.

7 III. STATEMENT OF CLAIM

8 Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as
 9 possible the facts showing that each plaintiff is entitled to the damages or other relief sought.
 10 State how each defendant was involved and what each defendant did that caused the plaintiff
 11 harm or violated the plaintiff's rights, including the dates and places of that involvement or
 11 conduct. If more than one claim is asserted, number each claim and write a short and plain
 11 statement of each claim in a separate paragraph. Attach additional pages if needed.

12 Instruments properly indorsed have been
 13 exchanged and sent to the Treasury.
 14 Sales have already been completed. The
 15 Trust is now the accommodation party for the debt.

16 IV. RELIEF

17 State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do
 18 not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing
 19 at the present time. Include the amounts of any actual damages claimed for the acts alleged and
 20 the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts,
 21 and the reasons you claim you are entitled to actual or punitive money damages. Attach
 21 additional pages if needed.

22 Attorney's fees, Motion To Compel Performance,
 23 Temporary Order preserving property.

24 V. CERTIFICATION AND CLOSING

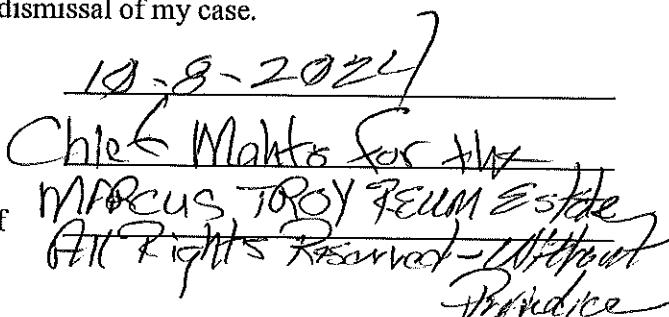
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my
 knowledge, information, and belief that this complaint: (1) is not being presented for an improper

Pro Se 1 2022

1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
2 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or
3 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so
4 identified, will likely have evidentiary support after a reasonable opportunity for further
5 investigation or discovery; and (4) the complaint otherwise complies with the requirements of
6 Rule 11.

7 I agree to provide the Clerk's Office with any changes to my address where case-related
8 papers may be served. I understand that my failure to keep a current address on file with the
9 Clerk's Office may result in the dismissal of my case.

10 Date of signing: 10-8-2024

11 Signature of Plaintiff 
12 Printed Name of Plaintiff MARCUS TROY REUM Estate
13 All Rights Reserved - Without
Prejudice

14 Date of signing: _____

15 Signature of Plaintiff _____

16 Printed Name of Plaintiff _____

17 _____

18 Date of signing: _____

19 Signature of Plaintiff _____

20 Printed Name of Plaintiff _____

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